

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

**KELLY BLAND,**

**Plaintiff,**

**v.**

**DIGITAL INSURANCE, LLC, d/b/a One  
Digital,**

**Defendant.**

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**Civil No. 7:25-cv-00050-O**

**UNOPPOSED MOTION TO EXTEND  
DEADLINE TO FILE MOTION FOR CLASS CERTIFICATION**

Plaintiff, with the agreement of Defendant, respectfully moves the Court for an extension of the deadline to file a motion for class certification. In support of this request, Plaintiff states as follows:

1. Under Local Civil Rule 23.2 of the Northern District of Texas, a motion for class certification must be filed not later than 90 days after the filing of the complaint, unless otherwise ordered by the Court, which is currently August 20, 2025.

2. Counsel for Plaintiff and Defendant have conferred, and Defendant does not oppose an extension of the class certification deadline.

3. The parties have agreed that the deadline to file Plaintiff's motion for class certification should be extended to April 17, 2026.

4. Good cause exists for this extension as the parties require additional time to complete discovery and prepare their respective positions on class certification. The extension will not prejudice either party and will promote the efficient presentation of issues to the Court.

For the foregoing reasons, Plaintiff respectfully requests that the Court enter an Order extending the deadline for filing Plaintiff's motion for class certification from August 20, 2025 to April 17, 2026.

Dated: August 19, 2025

By: /s/ Anthony I. Paronich

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*Counsel for Plaintiff*